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July 16, 2008

ECF and BY HAND

The Honorable Peter G. Sheridan
United States District Court
District of New Jersey
Martin Luther King, Jr. Building
and United States Court House
50 Walnut Street, Room 4062
Newark, New Jersey 07102

Re: Andorra Services Inc., and Chemoil Corp. v. Venfleet Ltd and M/T EOS
Civil Action No. 06 C.V. 00373 (Dist. New Jersey)
Charter Party dated December 19, 2005
Final Arbitration Award, dated June 5, 2008
Our File No.: 8726/JMT

Dear Honorable Sir:

We refer to the above captioned matter and as attorneys representing the Defendant interests, we are writing to the Court to request that the stay of the litigation pending arbitration as entered during October 2006, is lifted and that the Court schedule a pre-motion conference to confirm the arbitration award.

After motion practice during the summer of 2006, on October 18, 2006, the Court issued an Opinion and Order granting Defendants motion to stay the litigation proceedings pending maritime arbitration in New York City. For the Court's ready reference, we attach the Opinion and Order both dated October 18, 2006. Subsequently, on October 23rd, the Court entered an Order issuing an administrative dismissal of the legal proceedings without prejudice to the stay and allowing the parties to reopen the litigation proceedings for good cause.

After extensive arbitration proceedings in New York City, on June 5, 2008, the sole arbitrator, Mr. Jack Berg issued a Final Award dismissing the Plaintiffs cargo contamination claims and awarding the Defendant Vessel

7/24/08
Is Ordered
The matter is reopened
The confirmation of
award application
should be done by way
of motion and notice
to parties
Peter Marino

Honorable Peter G. Sheridan
United States District Court

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Owner charter party counterclaims in the total amount of \$1.98 million which included an allowance for the reimbursement of Defendants attorney's fees and costs and a credit for the payment of the arbitrator's fees.

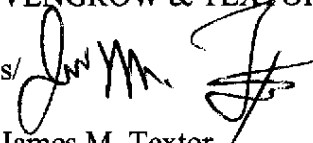
As the Final Award has not been satisfied, our clients have instructed our office to resume the litigation proceedings and pursuant to the Federal Arbitration Act, 9 USC Sections 8 and 9, to obtain an Order to confirm the Award as a Judgment.

Based on the above, the Defendants request that the Court lift the stay. Further, if convenient for the Court, we request that the Court schedule a Pre-Motion Conference to determine whether or not motion practice in fact is necessary and if so, to establish a motion practice schedule.

We will await receipt the Court's response.

Respectfully submitted,

CICHANOWICZ, CALLAN, KEANE,
VENGROW & TEXTOR, LLP

s/ 
James M. Textor

JMT/mc
Encls.

cc: Magistrate Judge Esther Salas (ECF & By Hand, w/Encls.)
United States Magistrate Judge
Martin Luther King, Jr. Federal Bldg. & Courthouse
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Newark, New Jersey 07101

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Attn: Jeremy J.O. Harwood, Esq.
Jack Greenbaum, Esq.
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Attn: Lawrence B. Brennan, Esq.
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